HAZARDOUS SPILL PROCEDURES

1] HAS THE FACILITY SUBMITTED A HAZARDOUS WASTE NOTIFICATION FORM TO THE POTW? HAS THE FACILITY SUBMITTED ANY TOXIC RELEASE FORMS {form R} TO THE EPA?

_____

_____

_____.

2] IS A SPILL PREVENTION PLAN ON FILE AT THE POTW? Y ✓ N___

3] IS THERE A PERSON IN CHARGE OF PROPER MANAGEMENT OF HAZARDOUS WASTE?

Y___ N___ NAME: Frank Formeister

4] HAZARDOUS WASTE STORAGE AREA

A] CLEAN AREA Y ✓ N___
B] DRUMS PROPERLY LABELED Y ✓ N___
C] ANY BERMS, OR DRAINS IN AREA Y___ N ✓
D] ARE INCOMPATIBLE WASTES STORED SEPARATELY Y ✓ N___

5] DOES THE FACILITY RETAIN RECORDS OF ANY OR ALL ANALYSIS OF WASTE, TRANSPORT, MANIFESTS, OR RECORDS OF INSPECTION OF STORAGE TANKS, CONTAINERS, & STORAGE AREAS? Y ✓ N___.

WASH DOWN PROCEDURES. {FREQUENCY, WATER USED, DETERGENTS}.
On file at Palmer Wastewater Treatment Plant.

A] DETERGENTS AND CHEMICAL CLEANERS HOW ARE THEY STORED?

Separate rooms. Various areas throughout the plant. Not stored around anything incompatible. All labeled properly.

PAINT SHOPS

1] IS THERE A PAINT SHOP ON THE PREMISES? Y✓ N___

2] IS THERE A BERM AROUND THE PAINT MACHINE? Y___ N✓

3] ARE THERE FLOOR DRAINS IN THE AREA? Y___ N✓

4] METHOD OF CLEANING PAINT MACHINE OR SPRAY GUNS. TYPES OF CHEMICALS USED ETC...

SAMPLING

1] ARE SAMPLING DATA - SELFMONITORING REPORTS SATISFACTORY? Y✓ N___

2]IS THERE CLEAR ACCESS TO THE SAMPLING POINT? Y✓ N___

3] IS THE AREA CLEAN? Y✓ N___

4] DOES MANHOLE NEED TO BE CLEANED OUT? Y___ N✓

5] IS SAMPLING POINT AT A CONTINUOUS FLOW POINT OR A DIRECT FLOW POINT?

Sampling point is located at the discharge to the Palmer Sewer System. Flow is continuous while a Batch is being discharged

ADDITIONAL COMMENTS:

No new processes
No new machines

TOWN OF PALMER
INDUSTRIAL INSPECTION FORM AND CHECKLIST

COMPANY NAME: RATHBONE PRECISION METALS INC.

TYPE OF INDUSTRY: METALS, ROLLED, DRAWN, ANNEALED & PICKLED

PLANT CONTACT: MR BRANDON ROBB OR GERRY LIS

TITLE: FACILITY MANAGER / MANUFACTURING ENGINEER

DATE: January 26, 2021

POTW INSPECTOR: Scott Williams & Steve Wippert

SIC CODE OR CODES 3316, 40 CFR METAL FINISHING, 40 CFR 468 COPPER POINT SOURCE CATEGEORY.

TIME OF ARRIVAL: 9:00A.M. TIME OF DEPARTURE 10:40 A.M.

NUMBER OF EMPLOYEES: 47

WORK SCHEDULE: MON-FRI 5:00A.M—11:00P.M .

PROCESS: ROLLING, ANNEALING DRAWN & PICKLING METALS.

RAW MATERIALS: CARBON & ALLOY STEEL, STAINLESS, COPPER & BRASS.

PRE-TREATMENT: HYDROXIDE PRECIPITATION.

WASTEWATER GENERATED: 25-3000 GPD

1] PRINCIPAL PRODUCT OR SERVICE OF FACILITY.

WIRE RODS.

2] DESCRIPTION OF MANUFACTURING OR PRODUCTION PROCESS.

ON FILE AT POTW.

3] NUMBER AND NAMES OF INDIVIDUALS WITH IWW LICENSE AT THE FACILITY, & THAT ARE INVOLVED IN THE PRE-TREATMENT PROGRAM.

3] NUMBER AND NAMES OF INDIVIDUALS WITH IWW LICENSE AT THE FACILITY, & THAT ARE INVOLVED IN THE PRE-TREATMENT PROGRAM.
GERRY LIS 3I and DAVE TALLMAN 5C and Francesco Martins 2I and Kane Riley 2I Jake Brockit 2I

4] FLOW INF. MAX_____ EFF MAX. 30,000 GPD

MIN _____ **MIN** 5,000

5] ANY CHANGES IN PROCESS SINCE LAST INSPECTION?
NO

6] ANNUAL FLOW INTO SEWER SYSTEM?
~1.1 MILLION GALLONS PER YEAR.

7] WHERE ARE FLOW & WATER METERS LOCATED, & ARE THEY FUNCTIONING PROPERLY? FLOW METER IS LOCATED AT END OF FINAL CLARIFIER. WATER METERS ARE LOCATED BY WASTEWATER TREATMENT SYSTEM, IN MAINTENANCE SHOP AND IN BASEMENT UNDER FRONT OFFICE ALL METERS APPEAR TO BE FUNCTIONING PROPERLY.

RECORDS PERMITS

1] CONTENTS OF PERMIT.
- A] STATEMENT OF DURATION — Y ✓ N
- B] STATEMENT OF NON-TRANSFERABILITY — Y ✓ N
- C] EFFLUENT LOCAL LIMITS — Y ✓ N

2] SELF MONITORING REQUIREMENTS
- A] POLLUTANTS TO BE MONITORED — Y ✓ N
- B] SAMPLING TIMES — Y ✓ N
- C] SAMPLING LOCATION\ DISCHARGE POINTS — Y ✓ N
- D] SAMPLE TYPE, GRAB OR COMPOSITE — Y ✓ N
- E] REPORTING REQUIREMENTS TIMES ETC. — Y ✓ N

3] COMPLIANCE SCHEDULES
- A] NOTICE OF HEAVY LOADING TO WWTP — Y ✓ N
- B] NOTIFICATION OF SPILL BYPASS ETC.. — Y ✓ N
- C] NOTIFICATION OF SIGNIFICANT CHANGE IN DISCHARGE — Y ✓ N
- D] SLUG DISCHARGE CONTROL PLAN — Y ✓ N

4] PRE-TREATMENT STANDARDS

A] INDUSTRIAL USER CATEGORY **40 CFR 433 & 40 CFR 468.**

B] CLASSIFICATION BY CATEGORY\ SUBCATEGORY. **433 METAL FINISHING &468 COPPER POINT SOURCE CATEGORY**

C] CLASSIFICATION AS A NEW OR EXISTING SOURCE - **EXISTING**

- D] APPLICATION OF LIMITS FOR ALL REGULATED POLLUTANTS — Y ✓ N
- E] IMPLEMENTATION OF LOCAL LIMITS — Y ✓ N
- F] APPLICATION OF MOST STRINGENT LIMIT — Y ✓ N

5] COMPLIANCE MONITORING

1] SAMPLING

A] ONCE PER YEAR	Y ✓ N___
B] DOCUMENTATION OF SAMPLING ACTIVITIES	Y ✓ N___
C] ANALYSES OF RESULTS FOR ALL PARAMETERS	Y ✓ N___
D] CORRECT ANALYTICAL METHODS	Y ✓ N___

6] SELF MONITORING AND REPORTING

A] SAMPLING AT FREQUENCY SPECIFIED	Y ✓ N___
B] ANALYZING ALL REQUIRED POLLUTANTS	Y ✓ N___
C] SUBMISSION OF 90 DAY DMR REPORT	Y ✓ N___
D] PERIODIC SELF MONITORING	Y ✓ N___
E] CERTIFICATION OF REPORTS	Y ✓ N___
F] COMPLIANCE SCHEDULES RECEIVED BY REQUIRED DATES	Y ✓ N___
G] NOTIFICATION TO WWTP ABOUT VIOLATIONS	Y ✓ N___
H] RESAMPLING WITHIN 30 DAYS OF NOV	Y ✓ N___
I] IMPLEMENTATION OF SLUG DISCHARGE CONTROL PLAN	Y ✓ N___

PRE-TREATMENT SYSTEMS

1] DESCRIBE ANY PRETREATMENT SYSTEMS AT THE FACILITY.

Hydroxide Precipitation. Flow goes through equalization tank, and then through tank 1 for pH adjustment & tank 2 for pH adjustment. From here into another tank where polymer is added, and then into a final clarifier with overflow into the Palmer sewer system.

2] ARE WASTE STREAMS COMBINED WITH DOMESTIC WASTE OR ARE THEY SEPARATE?

WASTE STREAMS ARE SEPARATE.THEY COMBINE AS SOON AS WASTEWATER LEAVES FINAL CLARIFIER.

3] TYPE OF FLOW MEASUREMENT USED, & FREQUENCY OF CALIBRATION.

Ultrasonic flow meter with a V Notch weir. Calibrated two times per year.

4] MAINTENANCE SCHEDULE OF PRE-TREATMENT SYSTEM.

Maintenance to pretreatment system is done on a weekly basis, and consists of clarifier pH probe and flow meter cleaning.

5] ARE WRITTEN LOGS KEPT FOR MAINTENANCE & CALIBRATION? Y ✓ N___

COOLING WATERS

1] SOURCES OF UNCONTAMINATED COOLING WATER.

Closed loop system

2] ANY SOURCES OF RECIRCULATED COOLING WATER?

Artesian well

3] DISPOSAL METHOD OF COOLING WATER

Non-contact cooling water is discharged directly to the town sewer system.

4] IS COOLING WATER TREATED BEFORE RELEASE? *{Yes in a closed loop system then through the treatment plant.)*

No.

5] IS THERE ANY SLUDGE GENERATED, & HOW IS IT DISPOSED OF.

Yes sludge is generated from settling tanks and also from cleaning of the production rinse tanks when cleaned. The sludge is dewatered in a plate & frame filter press and is disposed of in a sanitary landfill. Approximately 6.5 tons per year. They clean their process tanks approximately 6 times a year and send out approximately 6500 pounds of hazardous waste sludge.

6] IS THE SLUDGE LISTED AS HAZARDOUS WASTE, & IS IT MANIFESTED.

The sludge generated from the rinse tanks and settling tanks is not listed as a hazardous waste according to Brandon Robb facility manager. The sludge from the process tanks is considered hazardous waste and is manifested.

PRE-TREATMENT CON'T

SOLVENTS

1] DOES THE FACILITY USE ANY SOLVENTS OR DEGREASING AGENTS?

One solvent is used it is mineral spirits (Bayklean).

2] ARE THERE ANY SOLVENT WASTES HANDLED SEPARATELY FROM OTHER CLEANING WASTE?

All solvent wastes are put in with the waste oil.

3] IS THERE ANY PRE-TREATMENT PRIOR TO DISCHARGE? Y✓ N___

4] HOW IS ANY RESIDUAL SLUDGE AT THE BOTTOM OF A TANK DISPOSED OF ?

The sludge is put through a plate and frame press and is disposed of in a landfill.

5] IS THERE A SOLVENT RECOVERY PLAN IN PLACE AT THE FACILITY? Y✓ N___

6] IF SOLVENTS ARE USED HOW ARE THEY DISPOSED OF?

They are placed into separate drums and sent out as a hazardous waste.

BOILER BLOWDOWN

1] FREQUENCY AND VOLUME.

Blowdown goes directly into treatment system. There is no way to tell exactly how much volume is discharged. Time Based.

2] TYPES OF ADDITIVES OR PRE-TREATMENT USED IN BOILER BLOWDOWN.

NORMAL SCALING ADDITIVES .

HAZARDOUS SPILL PROCEDURES

1] HAS THE FACILITY SUBMITTED A HAZARDOUS WASTE NOTIFICATION FORM TO THE POTW? HAS THE FACILITY SUBMITTED ANY TOXIC RELEASE FORMS {form R} TO THE EPA?

_____

_____

_____.

2] IS A SPILL PREVENTION PLAN ON FILE AT THE POTW? Y_✓_ N____

3] IS THERE A PERSON IN CHARGE OF PROPER MANAGEMENT OF HAZARDOUS WASTE?

Y____ N____ **NAME:** Gerry Lis

4] HAZARDOUS WASTE STORAGE AREA

A] CLEAN AREA Y_✓_ N____
B] DRUMS PROPERLY LABELED Y_✓_ N____
C] ANY BERMS, OR DRAINS IN AREA Y____ N_✓_
D] ARE INCOMPATIBLE WASTES STORED SEPARATELY Y_✓_ N____

5] DOES THE FACILITY RETAIN RECORDS OF ANY OR ALL ANALYSIS OF WASTE, TRANSPORT, MANIFESTS, OR RECORDS OF INSPECTION OF STORAGE TANKS, CONTAINERS, & STORAGE AREAS? Y_✓_ N____.

WASH DOWN PROCEDURES. {FREQUENCY, WATER USED, DETERGENTS}.

Washdown of clarifiers in treatment system is done once per week. This washdown is put into a holding tank or recycled back through treatment system along with all cleaning house waste. All washdown will end up going back through treatment system. All rinse tanks are cleaned periodically; any sludge at the bottom of these tanks is barreled and shipped out as hazardous waste. All liquid from these tanks is re-used or is put into the WW treatment system.

A] DETERGENTS AND CHEMICAL CLEANERS HOW ARE THEY STORED?

Separate room. Haz waste and cleaning chemicals are all in same room separated by a fence there are berms separating the two areas.

PAINT SHOPS

1] IS THERE A PAINT SHOP ON THE PREMISES? Y___ N✓

2] IS THERE A BERM AROUND THE PAINT MACHINE? Y___ N✓

3] ARE THERE FLOOR DRAINS IN THE AREA? Y___ N✓

4] METHOD OF CLEANING PAINT MACHINE OR SPRAY GUNS. TYPES OF CHEMICALS USED ETC.

SAMPLING

1] ARE SAMPLING DATA - SELFMONITORING REPORTS SATISFACTORY? Y✓ N___

2] IS THERE CLEAR ACCESS TO THE SAMPLING POINT? Y✓ N___

3] IS THE AREA CLEAN? Y✓ N___

4] DOES MANHOLE NEED TO BE CLEANED OUT? Y___ N✓

5] IS SAMPLING POINT AT A CONTINUOUS FLOW POINT OR A DIRECT FLOW POINT?

Sampling point is located at end of final clarifier. The flow here is continuous while plant is running unless the equitation tanks are utilized during interruptions on second shift.

ADDITIONAL COMMENTS:

Installed a knew closed loop chiller system for the coil furnace
Installed a new scrubber system
New heater oxylate tank

NOTICES OF VIOLATION AND OTHER CORRESPONDENCE

4. PROGRAM CHANGES

Changes at existing SIU Facilities.

Rathbone – None

Profiles Inc. – None

V. INTERFERENCE/PASS-THROUGH DOCUMENTED IN 2020

The Palmer WPCF has not had any Pass- Trough's in 2020.

VI. NECESSARY ACTIONS TAKEN TO REDUCE THE INCIDENCE OF SIGNIFICANT VIOLATIONS BY SIU's

No action was necessary.

VII. LOCAL DISCHARGE LIMITS

The permits issued to the SIU's contain industry specific limits. The permit limits established for Rathbone, and Profiles, Inc.,

VIII. ANNUAL SAMPLING AND ANALYSIS OF INFLUENT, EFFLUENT AND SLUDGE

The wastewater treatment plant influent and plant effluent were composite sampled for analysis in January 2020. Facility sludge samples were also collected in January 2020. The completion of the above sampling and analysis with review, is a mechanism to manage prevention of interference with plant operations, pass through or sludge contamination.

Table 6 summarizes the data collected.

TABLE 6

INDUSTRIAL PRETREATMENT PROGRAM
ANNUAL WASTEWATER TREATMENT PLANT MONITORING
FOR 2020-2021

Parameter	SLUDGE		WASTEWATER		
	Total Metals	TCLP Metals	Influent	Effluent	
	Mg/kg 1/19/21	Mg/L 1/19/21	Mg/L 1/26/2021	Mg/L 1/26/21	
Arsenic	ND	ND			
Barium	ND	ND			
Cadmium	ND	ND	ND	ND	
Molybdenum	ND				
Chromium	22	ND	ND	ND	
Copper	560		.059	ND	
Lead	22	ND	ND	ND	
Mercury	ND	ND			
Nickel	12		ND	ND	
Aluminum	19000				
Selenium	ND	ND			
Silver		ND	ND	ND	
Zinc	550		.086	.047	
Cyanide total			ND	ND	
F.O.G.			21	ND	
% Solids	14.8	14.8			
pH					

10.IPP FORMS AND REPORTS

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A. IPP Sampling reports.
    1. Main plant sampling results
    2. Profiles sampling results
    3. Rathbone sampling results

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MAIN PLANT

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39 Spruce Street * East Longmeadow, MA 01028 * FAX 413/525-6405 * TEL. 413/525-2332

February 5, 2021

Ken Lord
Palmer WWTP
1 Norbell St
Palmer, MA 01080

Project Location: Palmer WWTP
Client Job Number:
Project Number: IPP
Laboratory Work Order Number: 21A1168

Enclosed are results of analyses for samples received by the laboratory on January 27, 2021. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Michelle Koch

Michelle M. Koch
Project Manager

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39 Spruce Street * East Longmeadow, MA 01028 * FAX 413/525-6405 * TEL. 413/525-2332

Palmer WWTP
1 Norbell St
Palmer, MA 01080
ATTN: Ken Lord

REPORT DATE: 2/5/2021

PURCHASE ORDER NUMBER:

PROJECT NUMBER: IPP

ANALYTICAL SUMMARY

WORK ORDER NUMBER: 21A1168

The results of analyses performed on the following samples submitted to CON-TEST, a Pace Analytical Laboratory, are found in this report.

PROJECT LOCATION: Palmer WWTP

FIELD SAMPLE #	LAB ID:	MATRIX	SAMPLE DESCRIPTION	TEST	SUB LAB
INF #1	21A1168-01	Waste Water		SM21-22 4500 CN E	
INF #2	21A1168-02	Waste Water		EPA 200.7	
INF #3	21A1168-03	Waste Water		EPA 1664B	
EFF #1	21A1168-04	Waste Water		SM21-22 4500 CN E	
EFF #2	21A1168-05	Waste Water		EPA 200.7	
EFF #3	21A1168-06	Waste Water		EPA 1664B	

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CASE NARRATIVE SUMMARY

ll reported results are within defined laboratory quality control objectives unless listed below or otherwise qualified in this report.

results of analyses reported only relate to samples submitted to Con-Test, a Pace Analytical Laboratory, for testing.
rtify that the analyses listed above, unless specifically listed as subcontracted, if any, were performed under my direction according to the approved methodologies listed
his document, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, the material contained in this report is, to the
of my knowledge and belief, accurate and complete.

Lisa Worthington

Lisa A. Worthington
Technical Representative

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39 Spruce Street * East Longmeadow, MA 01028 * FAX 413/525-6405 * TEL. 413/525-2332

Project Location: Palmer WWTP
Sample Description:
Work Order: 21A1168

Date Received: 1/27/2021

Field Sample #: INF #1
Sampled: 1/27/2021 08:00

Sample ID: 21A1168-01

Sample Matrix: Waste Water

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag/Qual	Method	Date Prepared	Date/Time Analyzed	Analyst
Cyanide	ND	0.010	mg/L	1		SM21-22 4500 CN E	2/2/21	2/3/21 15:45	DJM

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Project Location: Palmer WWTP
Sample Description:
Work Order: 21A1168

Date Received: 1/27/2021

Field Sample #: INF #2
Sampled: 1/27/2021 08:00

Sample ID: 21A1168-02

Sample Matrix: Waste Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag/Qual	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH
Chromium	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH
Copper	0.059	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH
Lead	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH
Nickel	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH
Silver	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH
Zinc	0.086	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:24	MJH

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Project Location: Palmer WWTP
Sample Description:
Work Order: 21A1168

Date Received: 1/27/2021

Field Sample #: INF #3
Sampled: 1/27/2021 08:00

Sample ID: 21A1168-03

Sample Matrix: Waste Water

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag/Qual	Method	Date Prepared	Date/Time Analyzed	Analyst
Oil & Grease (HEM)	21	5.6	mg/L	1		EPA 1664B	2/2/21	2/2/21 12:40	LL

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Project Location: Palmer WWTP
Sample Description:
Work Order: 21A1168

Date Received: 1/27/2021

Field Sample #: EFF #1
Sampled: 1/27/2021 08:00

Sample ID: 21A1168-04

Sample Matrix: Waste Water

Conventional Chemistry Parameters by EPA/APHA/SW-846 Methods (Total)

Analyte	Results	RL	Units	Dilution	Flag/Qual	Method	Date Prepared	Date/Time Analyzed	Analyst
Cyanide	ND	0.010	mg/L	1		SM21-22 4500 CN E	2/2/21	2/3/21 15:45	DJM

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39 Spruce Street * East Longmeadow, MA 01028 * FAX 413/525-6405 * TEL. 413/525-2332

Project Location: Palmer WWTP | Sample Description: | Work Order: 21A1168

Date Received: 1/27/2021

Field Sample #: EFF #2 | Sampled: 1/27/2021 08:00

Sample ID: 21A1168-05

Sample Matrix: Waste Water

Metals Analyses (Total)

Analyte	Results	RL	Units	Dilution	Flag/Qual	Method	Date Prepared	Date/Time Analyzed	Analyst
Cadmium	ND	0.0040	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH
Chromium	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH
Copper	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH
Lead	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH
Nickel	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH
Silver	ND	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH
Zinc	0.047	0.010	mg/L	1		EPA 200.7	1/29/21	1/30/21 16:31	MJH